

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No. 05-30117-KPN

KATHLEEN MILLER,  
Plaintiff

v.

VERIZON COMMUNICATIONS INC.,  
Defendant

**PLAINTIFF'S ASSENTED-TO MOTION FOR ENLARGEMENT OF TIME TO SERVE**  
**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY**  
**JUDGMENT AND TO FILE MOTION WITH THE COURT**

NOW COME the Plaintiff, Kathleen Miller, in the instant case, and respectfully requests that this Court allow her Assented-To Motion For Enlargement Of Time To Serve Plaintiff's Opposition To Defendant's Motion For Summary Judgment, from June 30, 2006 to July 10, 2006.

The Defendant's Motion for Summary Judgment raises issues to which the Plaintiff must respond. Given the numerous issues involved, the Plaintiff appropriately requests a ten-day enlargement of time within which to respond to the Defendant's Motion for Summary Judgment. Additionally, Counsel for the Plaintiff has various scheduling conflicts that will make it very difficult for the Plaintiff to file her Opposition To Defendant's Motion for Summary Judgment on June 30, 2006. Furthermore, Counsel for the Defendant has expressed his assent to this Motion.

WHEREFORE, the Plaintiff respectfully request that this Court grant the within Motion to extend the time to file her summary judgment opposition to July 10, 2006.

Respectfully submitted:

The Plaintiff  
KATHLEEN MILLER

By: /s/ Michael O. Shea  
Michael O. Shea, Esq.  
BBO No. 555474  
Counsel for the Plaintiff  
Law Office Of Michael O. Shea, P.C.  
451 Main Street  
Wilbraham, MA 01095  
Telephone No.: (413)596-8005  
Facsimile No.: (413)596-8095

Assented-To:

The Defendant  
VERIZON COMMUNICATIONS, INC.

By: /s/ Timothy P. Van Dyck  
Timothy P. Van Dyck, Esq.  
BBO No. 548347  
Counsel for the Defendant  
Edwards Angell Palmer & Dodge LLP  
101 Federal Street  
Boston, MA 02110  
Telephone No.: (617)439-4444  
Facsimile No.: (617)439-4170

Dated: June 22, 2006